

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
LORI HAHN, :  
Plaintiff, : CASE NO. 12-cv-4151  
-against- :  
BANK OF AMERICA, INC. and MARIA :  
LOCCISANO, :  
Defendants. :  
----- X

**DEFENDANT'S RENEWED REQUEST FOR TAXATION OF COSTS**

Pursuant to Fed. R. Civ. P. 54(d)(1), 28 U.S.C. § 1920, and S.D.N.Y. Local Civ. R. 54.1, Defendant Bank of America, N.A. (“the Bank”), as the prevailing party, hereby respectfully requests that Clerk of Court tax costs incurred in the above-captioned case.

On March 31, 2014, the Honorable Debra Freeman, United States Magistrate Judge, filed a Memorandum and Order granting Defendant’s motion for summary judgment, and, thereafter, on March 31, 2014, pursuant to Judge Freeman’s direction, the Clerk of Court entered final Judgment in favor of Defendant.

On April 11, 2014, Defendant as prevailing party on all of Plaintiff Lori Hahn’s (“Hahn” or “Plaintiff”) claims alleged in the Complaint, timely filed Defendant’s Request for Taxation of Costs within thirty (30) days after entry of final judgment by the District Court. As set forth in the Bill of Costs attached hereto as Exhibit A, and the Declaration of Counsel attached hereto as Exhibit B, the total costs that Defendant seeks as the prevailing parties is \$9,411.57. See Exhs A & B. However, because Plaintiff filed an Appeal, the Court denied Motion for Taxation of Costs on August 7, 2014 pending Plaintiff’s appeal, without prejudice to renew the motion if this Court’s judgment is affirmed.

On June 4, 2015, the United States Court of Appeals for the Second Circuit entered judgment affirming, per curiam, the judgment of the Southern District of New York. See June 4, 2015 Summary Order attached as Exhibit C. Hahn has not requested a rehearing or filed a petition for a writ of certiorari in the United States Supreme Court. On June 25, 2015, the United States Court of Appeals for the Second Circuit issued a Judgment Mandate effectively closing the matter. See June 25, 2015 Judgment Mandate attached as Exhibit D. The Hahn action thus has reached its final disposition and the Bill of Costs in the amount of \$9,411.57 may appropriately be taxed against Hahn pursuant to S.D.N.Y. Local Civ. R. 54.1.

Accordingly, Defendant respectfully requests that Clerk of Court tax costs incurred in the above-captioned case.

Respectfully submitted,

/s/Alice A. Kokodis  
Alice A. Kokodis  
Locke Lord LLP  
111 Huntington Avenue  
Boston, MA 02199  
Tele. No. (617) 239-0100  
Fax No. (617) 227-4420  
akokodis@edwardswildman.com

Dated: July 1, 2015

**CERTIFICATE OF SERVICE**

I hereby certify that on July 1, 2015, I electronically filed **Defendant's Renewed Request for Taxation of Costs** with the Clerk of the District Court using the CM/ECF system, and that a copy of the within was served via the Court's ECF filing system upon plaintiff's counsel as follows:

Eric Baum, Esq.  
SIMON, EISENBERG & BAUM, LLP  
24 Union Square East, Fifth Floor  
New York, NY 10003

/s/ Alice A. Kokodis

Alice A. Kokodis

# **EXHIBIT A**

## UNITED STATES DISTRICT COURT

for the

Southern District of New York

|                       |   |                             |
|-----------------------|---|-----------------------------|
| LORI HAHN             | ) |                             |
|                       | ) |                             |
|                       | ) |                             |
| V.                    | ) | Case No.: 1:12-cv-04151-DCF |
|                       | ) |                             |
| BANK OF AMERICA, INC. | ) |                             |
|                       | ) |                             |

## BILL OF COSTS

Judgment having been entered in the above entitled action on 03/31/2014 *Date* against Plaintiff, Lori Hahn, the Clerk is requested to tax the following as costs:

|  |                    |
|--|--------------------|
| Fees of the Clerk .....  | \$ .....           |
| Fees for service of summons and subpoena .....   | 234.95             |
| Fees for printed or electronically recorded transcripts necessarily obtained for use in the case .....                                       | 5,476.62           |
| Fees and disbursements for printing .....  | .....              |
| Fees for witnesses ( <i>itemize on page two</i> ) .....  | 0.00               |
| Fees for exemplification and the costs of making copies of any materials where the copies are necessarily obtained for use in the case ..... | .....              |
| Docket fees under 28 U.S.C. 1923 .....   | .....              |
| Costs as shown on Mandate of Court of Appeals .....  | .....              |
| Compensation of court-appointed experts .....  | .....              |
| Compensation of interpreters and costs of special interpretation services under 28 U.S.C. 1828 .....   | .....              |
| Other costs ( <i>please itemize</i> ) .....  | 3,700.00           |
| <b>TOTAL</b>   | <b>\$ 9,411.57</b> |

**SPECIAL NOTE:** Attach to your bill an itemization and documentation for requested costs in all categories.

## Declaration

I declare under penalty of perjury that the foregoing costs are correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed. A copy of this bill has been served on all parties in the following manner:



Electronic service



Other: \_\_\_\_\_



First class mail, postage prepaid

s/ Attorney: Alice A. KokodisName of Attorney: Alice A. Kokodis

For: Bank of America, N.A. *Name of Claiming Party* Date: 06/23/2015

## Taxation of Costs

Costs are taxed in the amount of \_\_\_\_\_ and included in the judgment.

By: \_\_\_\_\_

*Deputy Clerk**Date**Clerk of Court*

# UNITED STATES DISTRICT COURT

## NOTICE

**Section 1924, Title 28, U.S. Code (effective September 1, 1948) provides:**

**“Sec. 1924. Verification of bill of costs.”**

"Before any bill of costs is taxed, the party claiming any item of cost or disbursement shall attach thereto an affidavit, made by himself or by his duly authorized attorney or agent having knowledge of the facts, that such item is correct and has been necessarily incurred in the case and that the services for which fees have been charged were actually and necessarily performed."

**See also Section 1920 of Title 28, which reads in part as follows:**

"A bill of costs shall be filed in the case and, upon allowance, included in the judgment or decree."

**The Federal Rules of Civil Procedure contain the following provisions:**

**RULE 54(d)(1)**

#### **Costs Other than Attorneys' Fees.**

Unless a federal statute, these rules, or a court order provides otherwise, costs — other than attorney's fees — should be allowed to the prevailing party. But costs against the United States, its officers, and its agencies may be imposed only to the extent allowed by law. The clerk may tax costs on 14 day's notice. On motion served within the next 7 days, the court may review the clerk's action.

## **RULE 6**

**(d) Additional Time After Certain Kinds of Service.**

When a party may or must act within a specified time after service and service is made under Rule 5(b)(2)(C), (D), (E), or (F), 3 days are added after the period would otherwise expire under Rule 6(a).

**RULE 58(e)**

**Cost or Fee Awards:**

Ordinarily, the entry of judgment may not be delayed, nor the time for appeal extended, in order to tax costs or award fees. But if a timely motion for attorney's fees is made under Rule 54(d)(2), the court may act before a notice of appeal has been filed and become effective to order that the motion have the same effect under Federal Rule of Appellate Procedure 4(a)(4) as a timely motion under Rule 59.

# **EXHIBIT B**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X

LORI HAHN,

:

Plaintiff,

: CASE NO. 12-cv-4151

-against-

:

BANK OF AMERICA, INC. and MARIA  
LOCCISANO,

:

Defendants.

:

----- X

**DECLARATION OF COUNSEL**

Now comes Alice A. Kokodis who, after being first duly sworn according to law, deposes and states that she is of full legal age, has full knowledge of all events stated herein, and is competent to testify to the matters set forth below.

Further, Declarant states that:

1. I am an attorney in good standing licensed to practice law in the State of New York;
2. I am counsel with the law firm of Locke Lord LLP and I represent Defendant Bank of America, N.A., incorrectly identified in the Complaint as Bank of America, Inc. (“Defendant”) in this lawsuit;
3. During the course of discovery, Defendant took the deposition of plaintiff Lori Hahn (“Plaintiff” or “Hahn”), and expert witnesses, Michael Soudry (“Soudry”) and Dr. Roy Lubit (“Lubit) in defense of its claims. In addition, Plaintiff took the depositions of Anthony Volpicello (“Volpicello”), Maria Loccisano (“Loccisano”), Wyder Tutiven (“Tutiven”), Charles Castillo (“Castillo”), Evelyn Henriquez (“Henriquez”), Gabriella Ruhlig (“Ruhlig”), Maria Soares (“Soares”), Oliver Whitelaw (“Whitelaw”) and Tamara Johnson (“Johnson”), all either former or current employees of Bank of America, N.A., in support of her claims. Defendant relied on Volpicello, Loccisano, Tutiven, Castillo, Ruhlig, Soares, and Whitelaw’s deposition transcripts in

its successful summary judgment briefing before this Court. In procuring the deposition transcripts for filing with the Court in support of the Motion for Summary Judgment, Defendant incurred a cost of \$5,476.62. Attached hereto as Exhibit 1 are true and accurate copies of the invoices from Veritext New York Reporting Co., documenting these costs.

4. Defendant took the Hahn, Soudry and Lubit depositions for the purpose of summary judgment briefing, among other goals, and it was reasonably necessary for the defense of Defendant in this matter.

5. Defendant defended the depositions of Volipcello, Loccisano, Tutiven, Castillo, Henriquez, Ruhlig, Soares, Whitelaw and Johnson for the purpose of summary judgment briefing, among other goals, and it was reasonably necessary for the defense of Defendant in this matter.

6. Defendant took the depositions of Michael Soudry, M.B.A. and Dr. Roy Lubit because they were reasonably necessary for the defense of Defendant in this matter. Attached hereto as Exhibit 2 are true and accurate copies of the invoices for the service of subpoenas on Michael Soudry, MBA and Dr. Roy Lubit. In procuring the depositions of Soudry and Lubit, Defendant incurred a cost of \$3,700.00 for witness fees and attendance at deposition. Attached hereto as Exhibit 3 are true and accurate copies of the invoices for Soudry and Lubit's attendance at deposition.

7. The total amount of costs sought by Bank of America, N.A. as prevailing party is \$9,411.57.

Executed this 1 day of July, 2015.

---

*/s/Alice A. Kokodis*

Alice A. Kokodis

# **EXHIBIT 1**

Veritext New York Reporting Co.

200 Old Country Road, Suite 580  
Mineola, NY 11501  
Tel. (516) 808-2400 Fax. (516) 808-2460

Bill To: Alice A. Kokolis, Esq.  
Edwards Widman Palmer LLP  
111 Huntington Ave  
Boston, MA 02199

do not  
mail  
Invoice #: NY1642660  
Invoice Date: 12/27/2012  
Balance Due: \$500.75

|   |                    |
|---|--------------------|
| Case: Hahn v. Bank Of America<br>Job #: 1576545   Job Date: 12/14/2012   Delivery: Normal                       | File No: 12-CV4151 |
| Location: Simon Eisenberg & Baum LLP<br>24 Union Square East, 6th Floor   15 & 16th Street   New York, NY 10003 | 311979-090         |

| Attorney                | Description   | Units               | Qty                 | Rate                         | Amount   |
|-------------------------|---|---------------------|---------------------|------------------------------|--|
| Anthony Volpicello      | Certified Transcript<br>CD Depo Litigation Package<br>Shipping & Handling | Page Per CD Package | 133.0<br>1.0<br>1.0 | \$3.25<br>\$39.00<br>\$29.50 | \$432.25<br>\$39.00<br>\$29.50                                     |
| Notes:                  |   |                     |                     |                              |  |
| Fed. Tax ID: 20-3132669 | Term: Net 30  |                     |                     |                              |  |
|                         |   |                     |                     |                              | Invoice Total:<br>Payment:<br>Credit:<br>Interest:<br>Balance Due: |
|                         |   |                     |                     |                              | \$500.75<br>\$0.00<br>\$0.00<br>\$500.75                           |

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days.



E693153

Make check payable to:

Visa  MC  Amex  Discover  Lock Box

Credit Card #

Exp. Date

SIGNATURE (AS IT APPEARS ON CREDIT CARD)

PRINT NAME (AS IT APPEARS ON CREDIT CARD)

Invoice #: NY1642660  
Job #: 1576545  
Invoice Date: 12/27/2012  
Balance : \$500.75

Please remit payment to:  
Veritext  
P.O. Box 71303  
Chicago, IL 60694-1303

For more information on charges related to our services please consult [www.veritext.com/servicesinfo](http://www.veritext.com/servicesinfo)

006 185336 JAN 21 2013

NON TAXABLE

Veritext New York Reporting Co.

200 Old Country Road, Suite 580  
Mineola, NY 11501  
Tel. (516) 608-2400 Fax. (516) 608-2450

**Bill To:** Alice A. Kokodis, Esq.  
Edwards Wildman Palmer LLP  
111 Huntington Ave  
Boston, MA 02189

**Invoice #:** NY1646543  
**Invoice Date:** 12/31/2012  
**Balance Due:** \$548.25

|   |                    |
|---|--------------------|
| Case: Hahn v. Bank Of America   | File No: 12-CV4151 |
| Job #: 1576546   Job Date: 12/17/2012   Delivery: Normal  | <i>do not mail</i> |
| Location: Simon Eisenberg & Baum LLP<br>24 Union Square East, 6th Floor   16 & 18th Street   New York, NY 10003 | <i>311979-0010</i> |

| Warranty                       | Description   | Page                      | Qty                 | Rate                         | Amount   |
|--------------------------------|---|---------------------------|---------------------|------------------------------|--|
| Maria Loccisano                | Certified Transcript<br>CD Depo Litigation Package<br>Shipping & Handling | Page<br>Per CD<br>Package | 147.0<br>1.0<br>1.0 | \$3.25<br>\$39.00<br>\$20.50 | \$477.75<br>\$39.00<br>\$20.50   |
| <b>Notes:</b>                  |   |                           |                     |                              | <b>Invoice Total:</b> \$548.25   |
| <b>Fed. Tax ID: 20-3132689</b> |   |                           |                     |                              | <b>Payment:</b><br><b>Credit:</b><br><b>Interest:</b> \$0.00<br><b>Balance Due:</b> \$548.25 |

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days.



|   |           |
|---|-----------|
| Make check payable to:  |           |
| <input type="checkbox"/> Visa <input type="checkbox"/> MC <input type="checkbox"/> Amex <input type="checkbox"/> Discover <input type="checkbox"/> Lock Box |           |
| Credit Card #   | Exp. Date |
| SIGNATURE (AS IT APPEARS ON CREDIT CARD)  |           |
| PRINT NAME (AS IT APPEARS ON CREDIT CARD)   |           |

**Invoice #:** NY1646543  
**Job #:** 1576546  
**Invoice Date:** 12/31/2012  
**Balance :** \$548.25

**Please remit payment to:**  
Veritext  
P.O. Box 71303  
Chicago, IL 60604-1303

For more information on charges related to our services please consult [www.veritext.com/serviceinfo](http://www.veritext.com/serviceinfo)

005336 JAN 31 2013 *W* N-TAXABLE

# INVOICE

Veritext New York Reporting Co.

200 Old Country Road, Suite 580  
Mineola, NY 11501  
Tel. (516) 608-2400 Fax. (516) 608-2450

Bill To: Alice A. Kokodis, Esq.  
Edwards Wildman Palmer LLP  
111 Huntington Ave  
Boston, MA 02199

31/1979  
10  
Invoice #: NY1647347  
Invoice Date: 01/02/2013  
Balance Due: \$517.00

|           |   |
|-----------|---|
| Case:     | Hahn v. Bank Of America   |
| Job #:    | 1679748   Job Date: 12/18/2012   Delivery: Normal   |
| Location: | Simon Eisenberg & Baum LLP<br>24 Union Square East, 5th Floor   16 & 10th Street   New York, NY 10003 |

|                         |   |                           |                        |   |  |  |
|-------------------------|---|---------------------------|------------------------|---|--|--|
| Maria Loccisano         | Certified Transcript<br>CD Depo Litigation Package<br>Shipping & Handling | Page<br>Per CD<br>Package | 138.00<br>1.00<br>1.00 | 132.00<br>\$30.00<br>\$20.00                                    | \$448.00<br>\$30.00<br>\$20.00           |  |
| Notes:                  |   |                           |                        | Invoice Total<br>Payments<br>Credits<br>Interest<br>Balance Due | 517.00<br>0.00<br>0.00<br>0.00<br>517.00 |  |
| Fed. Tax ID: 20-3132569 | Term: Net 30  |                           |                        |   |  |  |

TERMS: Payable upon receipt. Accounts 30 days past due will bear a service charge of 1.5% per month. Accounts unpaid after 60 days become a debt of attorney. Collection costs to attorney paid by client. No extensions will be made after 90 days.



Please clear all bills and indicate with payment.

CVS 180364 FEB 18 2013

Make check payable to:

Veritext

Visa  MC  Amer  Discover  Lender

NON-TAXABLE

Job Confirmation No. 1647347  
Received 01/02/2013  
By [Signature]

Credit Card #

Expiration Date

CVV#

Please make payment to:  
P.O. Box 1330  
Chicago, IL 60612

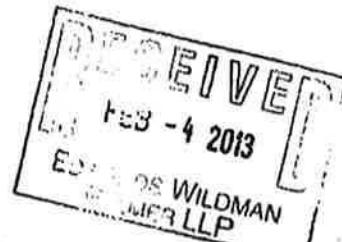
311979-0010

# INVOICE

Veritext New York Reporting Co.

200 Old Country Road, Suite 580  
Mineola, NY 11501  
Tel. (516) 608-2400 Fax. (516) 608-2450

**Bill To:** Attn: Debra Wildridge  
Edwards Wildman Palmer LLP  
111 Huntington Ave  
Boston, MA 02189-7618



Invoice #: NY1658898  
Invoice Date: 01/17/2013  
Balance Due: \$825.50

|           |   |
|-----------|---|
| Case:     | Hahn Lori v. Bank Of America  |
| Job #:    | 1575792   Job Date: 12/11/2012   Delivery: Normal   |
| Location: | Simon Eisenberg & Baum LLP<br>24 Union Square East, 5th Floor   15 & 16th Street   New York, NY 10003 |

Client #  
Matter #  
Hearing

|  |                      |      |       |                       |                 |
|--|----------------------|------|-------|-----------------------|-----------------|
| Charles D. Castillo  | Certified Transcript | Page | 51.00 | \$3.25                | \$165.75        |
| Evelyn (Guzman) Henriquez  | Certified Transcript | Page | 80.00 | \$3.25                | \$260.00        |
| Gabriella C. Ruhlig  | Certified Transcript | Page | 57.00 | \$3.25                | \$185.25        |
| Maria L. Soares  | Certified Transcript | Page | 53.00 | \$3.25                | \$171.50        |
| <b>Notes:</b>  |                      |      |       |                       |                 |
| <b>Fed. Tax ID:</b> 20-3132569   | <b>Term:</b> Net 30  |      |       | <b>Invoice Total:</b> | <b>\$825.50</b> |
| TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days subject to garnishment. Contact us to correct payment errors. No adjustments will be made after an invoice is issued. |                      |      |       |                       |                 |



E693956

Please tear off stub and return with payment.

Make check payable to: Veritext

Visa  MC  Amex  Discover

CVS 18786 J MAR 15 2013

Credit Card # XXXXXXXXXXXX

NON-REFUNDABLE

SIGNATURE (DO NOT PRINT) XXXXXXXXXXXX

PRINT NAME (LAST, FIRST, MIDDLE) XXXXXXXXXXXX

PHONE NUMBER XXXXXXXXXXXX

FAX NUMBER XXXXXXXXXXXX

received

2/18/13

Veritext

11501

NY

11501

# INVOICE

311979/0010

Veritext New York Reporting Co.

200 Old Country Road, Suite 580  
Mineola, NY 11501  
Tel. (516) 608-2400 Fax. (516) 608-2450

Bill To: Almee S. Lin Esq  
Edwards Wildman Palmer LLP  
1 Giralta Farms  
Madison, NJ 07940-1027

Invoice #: NY1666114  
Invoice Date: 01/29/2013  
Balance Due: \$316.50

|   |          |
|---|----------|
| Case: Hahn v. Bank Of America   | Client # |
| Job #: 1680039   Job Date: 1/18/2013   Delivery: Normal   | Matter # |
| Location: DC/Mineola - VIDEOCONFERENCE<br>200 Old Country Road   Suite # 580 -large conference room   Mineola, NY | Hearing  |

| Wyder Tullven           | Certified Transcript<br>CD Depo Litigation Package<br>Shipping & Handling | Page<br>Per CD<br>Package | 88.00<br>1.00<br>1.00 | 13.50<br>\$39.00<br>\$39.50                    | \$238.00<br>\$39.00<br>\$39.50                     |
|-------------------------|---|---------------------------|-----------------------|--|--|
| Notes:                  |   |                           |                       | Invoice Total<br>Payment<br>Credit<br>Interest | \$316.50<br>\$0.00<br>\$0.00<br>\$0.00<br>\$316.50 |
| Fed. Tax ID: 20-3132559 | Term: Net 30  |                           |                       |  |  |

TERMS: Payment must be received 30 days from date due or there will be a finance charge of 1.5% per month. Accounts unpaid after 90 days option to pay by collection agency.



E693881

Please sign and return with payment.

01/29/2013

Make check payable to Veritext

VISA  MC

NON-REFUNDABLE

AMERICAN

EXPRESS

DISCOVER

Invoice #: NY1666114  
Job Confirmation No. 1680039  
Invoice Date: 01/29/2013

Balance Due: \$316.50  
Last Payment: 01/29/2013  
Interest: \$0.00

RECEIVED

2013

1/29/2013

311979-0010

# INVOICE

Veritext New York Reporting Co.

200 Old Country Road, Suite 580  
Mineola, NY 11501  
Tel. (516) 608-2400 Fax. (516) 608-2450

OLC

Bill To: Debra Wildridge  
Edwards Wildman Palmer LLP  
1 Giralta Farms  
Madison, NJ 07940-1027

Invoice #: NY1678246  
Invoice Date: 02/13/2013  
Balance Due: \$610.60

|  |          |
|--|----------|
| Case: Hahn v. Bank Of America  | Hearing  |
| Job #: 1500039   Job Date: 1/18/2013   Delivery: Normal  | Client # |
| Location: DC/Mineola - VIDEOCONFERENCE<br>200 Old Country Road   Suite # 580 - large conference room ( Mineola, NY 11501 ) |          |

|  |  |                           |                        |  |                                      |
|--|--|---------------------------|------------------------|--|--------------------------------------|
| Oliver Whitelaw  | Certified Transcript<br>CD/Depo Libgation Package<br>Shipping & Handling | Page<br>Per CD<br>Package | 182.00<br>1.00<br>1.00 | \$3.60<br>\$49.00<br>\$49.60                   | \$832.00<br>\$39.00<br>\$39.60       |
| Notes:   |  |                           |                        | Invoice Total<br>Payment<br>Credit<br>Interest | \$610.60<br>0.00<br>0.00<br>\$610.60 |
| Fed. Tax ID: 20-3132669  | Term: Net 30   |                           |                        |  |                                      |
| TERMS: Payment upon receipt. Accounts 30 days past due will bear a finance charge of 1.75% per month. Accounts which after 90 days remain in pay status will be referred to a collection agency. Please contact us to correct payment errors. No adjustments will be made after 90 days. |  |                           |                        |  |                                      |



E693959

Please check off each item you require with payment.

received  
3/17/2013

CVS 18766 - MAR 19 2013



Invoice #: NY1678246  
Job Contractor No: 1500039  
Invoice Date: 02/13/2013  
Balance Due: \$610.60

Check here if you would like a  
copy of this invoice sent to you  
by e-mail.

# INVOICE

Veritext New York Reporting Co.

31979-  
0010

200 Old Country Road, Suite 580  
Mineola, NY 11501  
Tel. (516) 608-2400 Fax. (516) 608-2450

OK

**Bill To:** Debra Willbridge  
Edwards Wildman Palmer LLP  
111 Huntington Ave.  
Boston, MA 02198-7818

**Invoice #:** NY1678295  
**Invoice Date:** 02/14/2013  
**Balance Due:** \$550.00

**Case:** Hahn v. Bank Of America  
**Job #:** 1590043 | **Job Date:** 1/18/2013 | **Delivery:** Normal  
**Billing Atty:** Debra Willbridge  
**Location:** Audio Video Resources  
4323 E. Colton Cir. Blvd. | Phoenix, AZ 85040

**Hearing  
Client #**

**Demo Atty:** John Gallo Esq.

| Oliver Whitelaw   | Videoconference - Hourly Connection Fee | Hour | 6.00 | \$110.00                          | \$550.00 |
|---|---|------|------|-----------------------------------|----------|
| <b>Notes:</b> Videoconference - Billed bridging fees to Edwards only. |   |      |      | <b>Invoice Total:</b><br>\$550.00 |          |
| <b>Fed. Tax ID:</b> 20-3132569  | <b>Term:</b> Net 30                     |      |      | <b>Payment:</b><br>\$0.00         |          |

TERMS: Payment upon receipt. Account 30 days past due will bear a finance charge of 1.0% per month. Accounts unpaid after 60 days require 10% per month on outstanding balance.



E693931

received  
BLS/BS

Method of delivery to: Veritext

For delivery to: Debra Willbridge

**Invoice #:** NY1678295  
**Confirmation #:** 1590043  
**Invoice Date:** 02/14/2013  
**Balance Due:** \$550.00

# INVOICE

## Veritext New York Reporting Co.



E695025

200 Old Country Road, Suite 580  
Mineola, NY 11501  
Tel. (516) 608-2400 Fax. (516) 608-2450

O/C  
311979-  
0010

Bill To: Alice A Kokodis, Esq.  
Edwards Wildman Palmer LLP  
111 Huntington Ave.  
Boston, MA 02199-7618

Invoice #: NY1702502  
Invoice Date: 03/16/2013  
Balance Due: \$383.12

|  |         |
|--|---------|
| Case: Hahn Lord v. Bank Of America   | Hearing |
| Job #: 1621549   Job Date: 3/5/2013   Delivery: Normal                             | Item #  |
| Location: Office Suites PLUS Tynola<br>6047 Tynola Glen Cir.   Charlotte, NC 28217 |         |

| Tamara Johnson | Certified Transcript<br>CD Depo Litigation Package<br>Exhibits<br>Exhibits Scanned Searchable - OCR<br>Shipping & Handling | Page<br>Per CD<br>Per Page<br>Per page<br>Package | 79.00<br>1.00<br>36.00<br>36.00<br>100 | 3.00<br>339.00<br>0.45<br>0.28<br>139.50 | \$278.50<br>\$39.00<br>\$17.10<br>\$11.02<br>\$383.12 |
|----------------|--|---|--|--|---|
| Notes:         |  |   |  |  |   |

Fed. Tax ID: 20-3132569

Term: Net 30

TERMS: Payable upon receipt. Accounts 30 days past due will incur a finance charge of 1.5% per month. Accounts unpaid after 90 days may be referred to a collection agency. Contact us to correct payment errors. No adjustments will be made after 90 days.

Make check payable to: Veritext

Visa  MC  Amerex  Discover  American Express

CVS 1870832 APR 2013

Credit Card #

Expiration Date

Signature

NOT TAXABLE

RECEIVED

MAY 16 2013

VERITEXT

REPORTING CO.

# INVOICE

31979-0010

RECEIVED  
APR - 3 2013

ED WILDMAN  
LLP

Veritext New York Reporting Co.

200 Old Country Road, Suite 580  
Mineola, NY 11501  
Tel. (516) 608-2400 Fax. (516) 608-2450

Bill To: Alice A. Kokodis, Esq.  
Edwards Wildman Palmer LLP  
111 Huntington Ave.  
Boston, MA 02108-7618

Invoice #: NY1713939  
Invoice Date: 03/28/2013  
Balance Due: \$340.00

Case: Hahn Lori v. Bank Of America  
Job #: 1623492 | Job Date: 3/5/2013 | Delivery: Normal  
Billing Atty: Alice A. Kokodis, Esq.  
Location: Office Suites PLUS Tyvola  
6047 Tyvola Glen Cir. | Charlotte, NC 28217  
Sched Atty: Alice A. Kokodis, Esq.  
Depo Atty: Alice Kokodis

File No: 12-CV4151

|  |   |      |                |          |
|--|---|------|----------------|----------|
| Veritext Virtual Primary Participants<br>Conference Call | 1 | 1.00 | \$295.00       | \$295.00 |
|  | 1 | 1.00 | \$45.00        | \$45.00  |
| Notes:   |   |      | Invoice Total: | \$340.00 |
|  |   |      | Payment:       |          |
|  |   |      | Credit:        |          |
|  |   |      | (Interest):    | \$0.00   |
|  |   |      | Balance Due:   | \$340.00 |

Fed. Tax ID: 20-3132069 | Term: Net 30

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days become past due.

Contact us to correct payment errors. No adjustments will be made after 90 days.



E695034

Please tear off stub and return with payment.

CVS 189832 APR 22 2013

Make check payable to: Veritext

Visa  MC  Amex  Discover  Lock Box

NON-TAXABLE

Credit Card #

EXPIRE DATE

SIGNATURE (AS IT APPEARS ON CREDIT CARD)

W

PRINT NAME (AS IT APPEARS ON CREDIT CARD)

Please remit payment to:  
P.O. Box 71103  
Chicago, IL 60694-1303

For more information on services, call 1-800-333-1303

Received  
4/2/2013  
Invoice #: NY1713939  
Job #: 1623492  
Invoice Date: 03/28/2013  
Balance Due: \$340.00

**Veritext Corporate Services, Inc.**

290 West Mt. Pleasant Ave, Suite 2260  
 Livingston NJ 07039  
 Tel. 973-410-4040 Fax. 973-410-1313  
 Fed. Tax ID: 20-3457913

**Bill To:**

Bank of America  
 555 California St.  
 Fl. 8  
 San Francisco, CA, 94104-1511

Invoice #: CS1768627  
 Invoice Date: 6/4/2013  
 Balance Due: \$0.00  
 Agency #: 1650578

**Case:** Hahn, Lori v. Bank of America  
**Job #:** 1648783 | Job Date: 4/25/2013 | Delivery: Normal  
**Billing Atty:**  
**Location:** Edwards Wildman & Palmer LLP  
 750 Lexington Ave | 12th floor | New York, NY 10022  
**Sched Atty:** Alice A. Kokodis, Esq. | Edwards Wildman

Billing #: L27482-20120301  
 Matter #: L27482-20120301

| Witness        | Description                          | Units  | Quantity | Price   | Amount   |
|----------------|--------------------------------------|--|----------|---------|----------|
| Michael Soudry | Original with 1 Certified Transcript | Page   | 62.00    | \$4.00  | \$248.00 |
|                | Attendance Fee                       | 1  | 1.00     | \$50.00 | \$50.00  |
|                | CD Depo Litigation Package           | Per CD   | 1.00     | \$39.00 | \$39.00  |
|                | Shipping & Handling                  | Package  | 1.00     | \$18.00 | \$18.00  |
| Roy Lubit      | Original with 1 Certified Transcript | Page   | 133.00   | \$4.00  | \$532.00 |
| <b>Notes:</b>  |                                      | <b>Invoice Total:</b> \$887.00<br><b>Payment:</b> (\$887.00)<br><b>Credit:</b> \$0.00<br><b>Interest:</b> \$0.00<br><b>Balance Due:</b> \$0.00 |          |         |          |

**TERMS:** Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult <http://www.veritext.com/services/all-services/service-information>

**To pay online, go to  
[www.Veritext.com](http://www.Veritext.com)**

Veritext accepts all major credit cards  
 (American Express, Mastercard, Visa, Discover)

89621

Please remit payment to:  
 Veritext  
 P.O. Box 71303  
 Chicago IL 60694-1303

Invoice #: CS1768627  
 Job #: 1648783  
 Invoice Date: 6/4/2013  
 Balance: \$0.00

# EXHIBIT 2

YOU CAN NOW RETRIEVE A COPY OF THIS INVOICE ONLINE AT [WWW.SERVED.COM](http://WWW.SERVED.COM) - CLICK ON CHECK STATUS

# PAYMODE

Guaranteed Subpoena Service, Inc.  
P.O. Box 2248 - Union, New Jersey 07083  
(908) 687-0058 (800) 672-1952  
Fax: (908) 688-0885 Tax ID 22-2393486  
[www.Served.com](http://www.Served.com)

YOU CAN NOW PRINT A RECEIPT ONLINE AS A PAYMENT CONFIRMATION FOR YOUR RECORD  
SAVE A STAMP, TIME AND EFFORT AND PAY THIS INVOICE ONLINE. YOU MAY USE VISA, MASTERCARD, AMERICAN EXPRESS, DISCOVER OR EVEN A PAYPAL ACCOUNT!



E694629

311979  
10

## INVOICE

INVOICE #: 20130225152319  
AMOUNT DUE: \$204.95  
DUE DATE: 04/04/2013

EDWARDS WILDMAN PALMER, LLP-BOSTON  
JENNIFER HAGEMAN, ESQ.  
111 HUNTINGTON AVENUE  
BOSTON, MA 02199

WE RESERVE THE RIGHT TO CHARGE 18% APR INTEREST (0.049315% DPR PAST THE DUE DATE) ON ALL UNPAID BALANCES.

\* Tear along the perforation and keep the middle stub for your records! Return the bottom stub with your payment. Thank you for your business!

AMOUNT DUE: \$204.95 DUE DATE: 04/04/2013 INVOICE #: 20130225152319 INVOICE DATE: 03/05/2013

ATTORNEY: JENNIFER HAGEMAN, ESQ.  
FIRM: EDWARDS WILDMAN PALMER, LLP-BOSTON  
PLAINTIFF: LORI HAHN  
DEFENDANT: BANK OF AMERICA, INC  
DOCKET#: 12 CV 4151 CLAIM#:  
ENTITY SERVED: ROY LUBIT, M.D., PH.D.  
SERVED WITH: SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION, FEDERAL RULE OF CIVIL  
PROCEDURE  
SERVED DATE: 02/28/2013 COURT DATE: 03/08/2013

|                           |          |                      |                  |
|---------------------------|----------|----------------------|------------------|
| ATTENDANCE FEE:           | \$0.00   | PAYMENT SENT ON:     | 111/111/111      |
| SERVICE FEE:              | \$119.95 | AMOUNT PAID:         | 1111111111       |
| MILEAGE FEE:              | \$0.00   | [ ] CHECK            |                  |
| PRIORITY FEE:             | \$30.00  | [ ] VISA             |                  |
| PICKUP FEE:               | \$0.00   | [ ] MASTERCARD       |                  |
| INCORRECT ADDRESS FEE:    | \$0.00   | [ ] DISCOVER         |                  |
| POSTAL FORWARDING FEE:    | \$0.00   | [ ] AMERICAN EXPRESS |                  |
| CASH ATTACHED:            | \$55.00  |                      |                  |
| WAIT TIME 0.00 HOURS FEE: | \$0.00   |                      |                  |
| NOTARY/MISC FEE:          | \$0.00   |                      |                  |
| TOTAL:                    | \$204.95 | CARD/CHECK#:         | 1111111111111111 |

\* Tear along the perforation and keep the middle stub for your records! Return the bottom stub with your payment. Thank you for your business!

EDWARDS WILDMAN PALMER, LLP-BOSTON  
111 HUNTINGTON AVENUE  
BOSTON, MA 02199

INVOICE #: 20130225152319  
AMOUNT DUE: \$204.95  
DUE DATE: 04/04/2013

For the fastest resolution to your billing inquiry, email us at:  
[Billing@Served.com](mailto:Billing@Served.com)

[ ] CHECK



received  
LAP 4/1/13

[ ] Visa [ ] MasterCard [ ] Discover [ ] American Express

CARD #: 1111111111111111

EXPIRATION: 11/11

SIGNATURE:

GUARANTEED SUBPOENA SERVICE, INC.  
[WWW.SERVED.COM](http://WWW.SERVED.COM)  
P.O. BOX 2248  
UNION, NJ 07083

CVS 189721 APR 22 2013 NON-TAXABLE

2013022132319

YOU CAN NOW RETRIEVE A COPY OF THIS INVOICE ONLINE AT [WWW.SERVED.COM](http://WWW.SERVED.COM) - CLICK ON CHECK STATUS!

Guaranteed Subpoena Service, Inc.  
P.O. Box 2248 - Union, New Jersey 07083  
(908) 887-0056 (800) 872-1952  
Fax: (808) 688-0885 Tax ID 22-2393485  
[www.Served.com](http://www.Served.com)



311979-0010  
OK

YOU CAN NOW PRINT A RECEIPT ONLINE AS A PAYMENT CONFIRMATION FOR YOUR RECORD. SAVE A STAMP, TIME AND EFFORT, AND PAY THIS INVOICE ONLINE! YOU MAY USE VISA, MASTERCARD, AMERICAN EXPRESS, DISCOVER OR EVEN A PAYPAL ACCOUNT!

EDWARDS WILDMAN PALMER, LLP-BOSTON  
ALICE KOKODIS, ESQ  
111 HUNTINGTON AVENUE  
BOSTON, MA 02199

INVOICE #: 20130225151508  
AMOUNT DUE: \$30.00  
DUE DATE: 04/04/2013

WE RESERVE THE RIGHT TO CHARGE 18% APR INTEREST (0.048316% DPR PAST THE DUE DATE) ON ALL UNPAID BALANCES.

Tear along the perforation and keep the middle stub for your records! Return the bottom stub with your payment. Thank you for your business!

|                           |  |   |                          |
|---------------------------|--|---|--------------------------|
| AMOUNT DUE: \$30.00       | DUE DATE: 04/04/2013   | INVOICE #: 20130225151508                 | INVOICE DATE: 03/05/2013 |
| ATTORNEY:                 | ALICE KOKODIS, ESQ   |   |                          |
| FIRM:                     | EDWARDS WILDMAN PALMER, LLP-BOSTON   |   |                          |
| PLAINTIFF:                | LORI HAHN  |   |                          |
| DEFENDANT:                | BANK OF AMERICA, INC.  |   |                          |
| DOCKET#:                  | 12 CV 4151   | CLAIM#:                                   |                          |
| ENTITY SERVED:            | MICHAEL SOUDRY, M.B.A  |   |                          |
| SERVED WITH:              | SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION, FEDERAL RULE OF CIVIL |   |                          |
| PROCEDURE                 |  | COURT DATE:                               | 03/08/2013               |
| SERVED DATE:              |  |   |                          |
| ATTENDANCE FEE:           | \$0.00   | PAYMENT SENT ON:                          | _____                    |
| SERVICE FEE:              | \$0.00   | AMOUNT PAID:                              | _____                    |
| MILEAGE FEE:              | \$0.00   |   |                          |
| PRIORITY FEE:             | \$30.00  | <input type="checkbox"/> CHECK            |                          |
| PICKUP FEE:               | \$0.00   | <input type="checkbox"/> VISA             |                          |
| INCORRECT ADDRESS FEE:    | \$0.00   | <input type="checkbox"/> MASTERCARD       |                          |
| POSTAL FORWARDING FEE:    | \$0.00   | <input type="checkbox"/> DISCOVER         |                          |
| CASH ATTACHED:            | \$0.00   | <input type="checkbox"/> AMERICAN EXPRESS |                          |
| WAIT TIME 0.00 HOURS FEE: | \$0.00   | CARD/CHECK#:                              | _____                    |
| NOTARY/MISC. FEE:         | \$0.00   |   |                          |
| TOTAL:                    | \$30.00  |   |                          |

Tear along the perforation and keep the middle stub for your records! Return the bottom stub with your payment. Thank you for your business!

EDWARDS WILDMAN PALMER, LLP-BOSTON  
111 HUNTINGTON AVENUE  
BOSTON, MA 02199

INVOICE #: 20130225151508  
AMOUNT DUE: \$30.00  
DUE DATE: 04/04/2013

For the fastest resolution to your billing inquiry, email us at:  
[Billing@Served.com](mailto:Billing@Served.com)

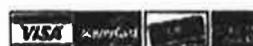
**CVS 188623 MAR 18 2013**

GUARANTEED SUBPOENA SERVICE, INC.  
[WWW.SERVED.COM](http://WWW.SERVED.COM)  
P.O. BOX 2248  
UNION, NJ 07083

**CVS 188623 MAR 18 2013**



CHECK



Visa  MasterCard  Discover  American Express

CARD #: \_\_\_\_\_

EXPIRATION: \_\_\_\_\_

SIGNATURE: \_\_\_\_\_

3/22/13 646  
received  
NON-TAXABLE

# **EXHIBIT 3**

#187383

**ECO-STAT LLC**  
ECONOMIC & STATISTICAL CONSULTANTS

**New Jersey**  
100 Eagle Rock Ave., Suite 200  
East Hanover, NJ 07936  
973.929.3632 Tel  
973.929.3633 Fax  
[ecostat@friedmanllp.com](mailto:ecostat@friedmanllp.com)  
[www.ecostat.com](http://www.ecostat.com)

**New York**  
1700 Broadway, 23rd Floor  
New York, New York 10019  
212.842.7695 Tel  
212.842.7001 Fax  
(800) ECO-STAT Tel  
(888) ECO-STAT Fax

February 28, 2013

Edward Widman Palmer, LLP  
111 Huntington Avenue  
Boston, MA 02199

**Re: Lori Hahn  
Our Case No.: 5131094**

Deposition testimony on March 7, 2013

2 hours @ \$350.00 per hour: \$700.00

Tax ID: 13-4138344



Eco-Stat LLC is an affiliated company of Friedman LLP, Accountants and Advisors

February 28, 2013 486276

\*\*\*SEVEN HUNDRED AND 00/100 DOLLARS\*\*\*

\$\*\*\*700.00

ECO-STAT LLC  
1700 Broadway, 23rd Floor  
New York, NY 10019  
U.S.A.

39062 ECO-STAT LLC 486276

| Invoice No. | Invoice Date | Description  | Invoice  | Discount | Payment  |
|-------------|--------------|--|----------|----------|----------|
| 311979.0010 | 2/28/2013    | for Deposition Testimony on March 7, 2013,<br>re: Lori Hahn, Our Case Number 5131094 | \$700.00 | \$0.00   | \$700.00 |



**Roy Lubit MD, Ph.D.**

165 West End Ave 3K  
New York, NY 10023

roylubit@rcn.com  
917-846-7829

Board Certifications  
Psychiatry and Neurology  
Child & Adolescent Psychiatry  
Forensic Psychiatry

March 4, 2013

Bill for Deposition Concerning Hahn Case

\$3000

*Roy Lubit*



# **EXHIBIT C**

14-1454

*Hahn v. Bank of America N.A.*

**UNITED STATES COURT OF APPEALS  
FOR THE SECOND CIRCUIT**

**SUMMARY ORDER**

RULINGS BY SUMMARY ORDER DO NOT HAVE PRECEDENTIAL EFFECT. CITATION TO A SUMMARY ORDER FILED ON OR AFTER JANUARY 1, 2007, IS PERMITTED AND IS GOVERNED BY FEDERAL RULE OF APPELLATE PROCEDURE 32.1 AND THIS COURT'S LOCAL RULE 32.1.1. WHEN CITING A SUMMARY ORDER IN A DOCUMENT FILED WITH THIS COURT, A PARTY MUST CITE EITHER THE FEDERAL APPENDIX OR AN ELECTRONIC DATABASE (WITH THE NOTATION "SUMMARY ORDER"). A PARTY CITING A SUMMARY ORDER MUST SERVE A COPY OF IT ON ANY PARTY NOT REPRESENTED BY COUNSEL.

At a stated term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, 40 Foley Square, in the City of New York, on the 4<sup>th</sup> day of June, two thousand fifteen.

PRESENT: ROBERT D. SACK,  
RICHARD C. WESLEY,  
PETER W. HALL,  
*Circuit Judges.*

---

LORI HAHN,

*Plaintiff-Appellant,*

-v.-

No. 14-1454

BANK OF AMERICA N.A.,

*Defendant-Appellee,*

MARIA LOCCISANO,

*Defendant.*

For Plaintiff-Appellant: Eric M. Baum, Eisenberg & Baum, LLP,  
New York, NY.

For Defendant-Appellee: Alice A. Kokodis, Edwards Wildman Palmer LLP, Boston, MA.

Appeal from the United States District Court for the Southern District of New York (Freeman, M.J.).

**UPON DUE CONSIDERATION, IT IS HEREBY ORDERED,**

**ADJUDGED AND DECREED** that the judgment is **AFFIRMED**.

Plaintiff Lori Hahn brought suit against her former employer, Bank of America (“BOA” or the “Bank”), under both Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, *et seq.*, and the New York State Human Rights Law (“NYSHRL”), N.Y. Exec. Law § 290, *et seq.*, claiming the Bank discriminated against her on the basis of her national origin, created a hostile work environment, and retaliated against her for her complaints to the Bank’s human resources department. Following discovery, BOA moved for summary judgment and Hahn voluntarily dismissed her discrimination claim. In its March 31, 2014, Memorandum and Opinion, the magistrate judge granted summary judgment for BOA on Hahn’s retaliation and hostile work environment claims. Hahn

appeals that decision. We affirm for reasons stated by the magistrate judge in her Memorandum and Opinion.

We have considered all of Hahn's arguments and find them to be without merit. Accordingly, we **AFFIRM** the judgment.

FOR THE COURT:

Catherine O'Hagan Wolfe, Clerk

A handwritten signature in black ink that reads "Catherine O'Hagan Wolfe". To the left of the signature is a circular official seal. The seal has "UNITED STATES" at the top, "SECOND CIRCUIT" in the center, and "COURT OF APPEALS" at the bottom. There are small stars on either side of the text.

# **EXHIBIT D**

# MANDATE

14-1454

*Hahn v. Bank of America N.A.*

N.Y.S.D. Case #  
12-cv-4151(DCF)

## UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT

### SUMMARY ORDER

RULINGS BY SUMMARY ORDER DO NOT HAVE PRECEDENTIAL EFFECT. CITATION TO A SUMMARY ORDER FILED ON OR AFTER JANUARY 1, 2007, IS PERMITTED AND IS GOVERNED BY FEDERAL RULE OF APPELLATE PROCEDURE 32.1 AND THIS COURT'S LOCAL RULE 32.1.1. WHEN CITING A SUMMARY ORDER IN A DOCUMENT FILED WITH THIS COURT, A PARTY MUST CITE EITHER THE FEDERAL APPENDIX OR AN ELECTRONIC DATABASE (WITH THE NOTATION "SUMMARY ORDER"). A PARTY CITING A SUMMARY ORDER MUST SERVE A COPY OF IT ON ANY PARTY NOT REPRESENTED BY COUNSEL.

At a stated term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, 40 Foley Square, in the City of New York, on the 4<sup>th</sup> day of June, two thousand fifteen.

PRESENT: ROBERT D. SACK,  
RICHARD C. WESLEY,  
PETER W. HALL,  
*Circuit Judges.*

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: June 25, 2015

---

LORI HAHN,

*Plaintiff-Appellant,*

-v.-

No. 14-1454

BANK OF AMERICA N.A.,

*Defendant-Appellee,*

MARIA LOCCISANO,

*Defendant.*

---

For Plaintiff-Appellant:

Eric M. Baum, Eisenberg & Baum, LLP,  
New York, NY.

For Defendant-Appellee:

Alice A. Kokodis, Edwards Wildman  
Palmer LLP, Boston, MA.

Appeal from the United States District Court for the Southern District of New York (Freeman, M.J.).

**UPON DUE CONSIDERATION, IT IS HEREBY ORDERED,**

**ADJUDGED AND DECREED** that the judgment is **AFFIRMED**.

Plaintiff Lori Hahn brought suit against her former employer, Bank of America (“BOA” or the “Bank”), under both Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e, *et seq.*, and the New York State Human Rights Law (“NYSHRL”), N.Y. Exec. Law § 290, *et seq.*, claiming the Bank discriminated against her on the basis of her national origin, created a hostile work environment, and retaliated against her for her complaints to the Bank’s human resources department. Following discovery, BOA moved for summary judgment and Hahn voluntarily dismissed her discrimination claim. In its March 31, 2014, Memorandum and Opinion, the magistrate judge granted summary judgment for BOA on Hahn’s retaliation and hostile work environment claims. Hahn

appeals that decision. We affirm for reasons stated by the magistrate judge in her Memorandum and Opinion.

We have considered all of Hahn's arguments and find them to be without merit. Accordingly, we **AFFIRM** the judgment.

FOR THE COURT:  
Catherine O'Hagan Wolfe, Clerk

  
Catherine O'Hagan Wolfe



A True Copy

Catherine O'Hagan Wolfe, Clerk

United States Court of Appeals, Second Circuit



  
Catherine O'Hagan Wolfe<sup>3</sup>